

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

THE PORTLAND MINT, )  
                          )  
                          Plaintiff, )  
                          )  
                          v. )  
                          )  
                          )                No. 20-518C  
                          )                (Judge Horn)  
THE UNITED STATES, )  
                          )  
                          Defendant. )  
                          )

DEFENDANT'S FIRST MOTION FOR AN  
ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

Pursuant to Rule 6(b) of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully requests an enlargement of time of 60 days, to and including August 28, 2020, within which to file our response to the complaint filed by plaintiff, The Portland Mint. This is our first request for an enlargement of time for this purpose. Counsel for Portland Mint has indicated that plaintiff will only consent to an enlargement of 30 days, to and including July 29, 2020. Undersigned counsel is currently scheduled to perform at least two weeks of military duty for the Air Force Reserves during the month of July, however, and will be unavailable to work on this matter for most of the period consented to by Plaintiff.

Good cause exists for this motion. As required by 28 U.S.C. § 520, counsel for the defendant has requested that the agency, the United States Bureau of the Mint, provide a litigation report to include a draft response to the complaint. Although the agency has been working diligently on the litigation report, counsel for the agency has informed undersigned counsel that an additional 30 days, until July 31, is needed to complete the litigation report. After receiving the litigation report, undersigned counsel will require additional time to review

materials, draft our response, coordinate with the agency, and obtain required approvals before filing our response.

The additional time requested is also necessary because of other work commitments that have required and continue to require undersigned counsel's attention, including, in the Court of Federal Claims: (1) active discovery in *Entergy Nuclear Indian Point 2, LLC v. United States*, Fed. Cl. No. 19-949C; (2) active discovery in *Holtec Pilgrim, LLC v. United States*, Fed. Cl. 19-1159; (3) active discovery in *Advanced Powder Solutions, Inc. v. United States*, Fed. Cl. No. 20-137C; (4) answer in *Boston Edison Company, et al., v. United States*, Fed. Cl. No. 20-529C, which is currently due on August 28, 2020; (5) ongoing litigation in *Mind Your Business, Inc. v. United States*, Fed. Cl. No. 20-429, a bid protest matter that is currently in a voluntary remand status with a status report due on June 30, 2020; (6) motion to dismiss and motion for summary judgment in *Vanquish Worldwide, LLC v. United States*, Fed. Cl. No. 17-96C, which is currently due on July 31, 2020; and (7) active discovery, including preparation for upcoming depositions, in *Vanquish Worldwide*; in the Court of Appeals for the Federal Circuit: (1) response brief in *Camille Mauro v. Social Security Administration*, Fed. Cir. No. 20-1252, which will be due within 21 days after petitioner's opening brief is filed, which is currently overdue; (2) response brief in *Billie O. Stone v Secretary of Veterans Affairs*, Fed. Cir. No 20-1732, which will be due within 21 days after petitioner's opening brief is filed, which is currently due on June 23, 2020; response brief in *Gary R. Larson, Jr. v. Robert Wilkie*, Fed. Cir. No. 20-1647, which will be due within 40 days after appellant's opening brief, which is currently due on July 17, 2020.

Additionally, undersigned counsel is currently scheduled to perform two weeks of Air Force Reserve at Tyndall Air Force Base, FL. Pending final approval from the Air Force, undersigned counsel is scheduled to travel to Florida to perform one week of duty at Tyndall

AFB, during the week of July 13-17, and he will then complete one more week of service, via telework, during the week of July 20-24. Although undersigned counsel will be teleworking for the Air Force during July 20-24, he will remain on active duty during that period and will be prohibited from working on legal matters for the Department of Justice. In addition to the two weeks of Air Force Reserve duty already scheduled, undersigned counsel must also complete an additional two weeks of duty before October 1, 2020, in order to fulfill his military obligations for the year. Undersigned counsel's military commander has asked him to perform at least some of that additional duty during July 2020. Finally, Mr. Singley will be away on pre-scheduled leave during the week of June 29-July 3, 2020.

Accordingly, we respectfully request that the Court grant our first request for an enlargement of time of 60 days, to and including August 28, 2020, within which to file our response to plaintiff's complaint.

Respectfully Submitted,

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